

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a	)	Case No. 16-cv-1054 (DTS)
Delaware corporation,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
FEDERAL INSURANCE COMPANY,	)	
an Indiana corporation and ACE	)	
AMERICAN INSURANCE COMPANY,	)	
a Pennsylvania corporation,	)	
	)	
Defendants.	)	
	)	

**COURT VOIR DIRE QUESTIONS REQUESTED BY  
PLAINTIFF FAIR ISAAC CORPORATION**

Plaintiff Fair Isaac Corporation (“FICO”) respectfully submits the following areas of inquiry to the Court as its proposed *voir dire*. Plaintiff proposes the following questions to be asked by the Court of the jury pool as a group, with additional follow up questions as appropriate.

**A. BACKGROUND AND RELEVANT WORK EXPERIENCE**

1. Can each of you tell me about your education?
  - How far did you go in school?
  - If you have a college or graduate degree, please tell me what degree you have, the subject, and what school you attended.
  
2. What is your employment status?
  - Who is your employer, what is your job title, and what are your work duties?
  - If you are retired, what was your job before you retired?
  - If you are unemployed, what was your last job?
  - Do you have any senior management experience?
  - Do you have any middle management experience?

3. Raise your hand if you or someone close to you has any training or experience working in: **[ask each one and follow-up with “Can you tell me about that?” before moving to next field]**
  - Law
  - Investments or financial planning
  - Negotiating, editing, or reviewing contracts
  - IT or tech
  - Negotiating, drafting, reviewing, or approving licensing agreements
  - Copyrights or patents
  - Software design, development, or coding
  - Engineering
  - Enterprise software
  - Enterprise agreements
4. Raise your hand if you, your spouse, or a close family member has ever been self-employed or owned a business.
  - Who?
  - What kind of business?
  - Is it still operating?
5. Raise your hand if you have ever had any type of contract dispute, for example, a breach of contract.
  - Can you tell me about that?

**B. INSURANCE EXPERIENCE AND ATTITUDES**

6. Raise your hand if you, your spouse, or a close family member has ever worked for an insurance company.
  - Can you tell me about that?
7. Raise your hand if you, your spouse, or a close family member has ever worked in the insurance field, for example, as an underwriter or insurance broker.
  - Can you tell me about that?
8. Raise your hand if you have ever purchased any type of specialty insurance—for example, malpractice insurance—for your employer, your business, or yourself?
9. Have you or a family member ever had an investment, owned stock, or had any other financial interest in any insurance company or insurance broker?
  - Can you tell me about that?

**C. EXPERIENCE WITH PATENTS, LICENSES, AND TRADEMARKS**

10. Raise your hand if you or a close family member has ever applied for a patent or copyright.
- Can you tell me about that?

MERCHANT & GOULD P.C.

DATE: January 25, 2023

/s/ Heather Kliebenstein

Allen Hinderaker, MN Bar # 45787  
Heather Kliebenstein, MN Bar # 337419  
Paige S. Stradley, MN Bar #393432  
Michael A. Erbele, MN Bar # 393635  
Joseph Dubis, MN Bar # 0398344  
Gabrielle L. Kiefer, MN Bar # 0402364  
MERCHANT & GOULD P.C.  
150 South Fifth Street  
Suite 2200  
Minneapolis, MN 55402  
Tel: (612) 332-5300  
Fax: (612) 332-9081  
ahinderaker@merchantgould.com  
hkliebenstein@merchantgould.com  
pstradley@merchantgould.com  
merbele@merchantgould.com  
jdubis@merchantgould.com  
gkiefer@merchantgould.com